

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

---

ADAPTIX, INC.,

Plaintiff,

v.

ALCATEL-LUCENT USA, INC. and  
AT&T MOBILITY LLC,

Defendants.

Civil Action 6:12-cv-022

---

ADAPTIX, INC.,

Plaintiff,

v.

ALCATEL-LUCENT USA, INC. and  
CELLCO PARTNERSHIP d/b/a VERIZON  
WIRELESS,

Defendants.

Civil Action 6:12-cv-122

---

ADAPTIX, INC.,

Plaintiff,

v.

ALCATEL-LUCENT USA, INC. and  
SPRINT SPECTRUM L.P.,

Defendants.

---

Civil Action 6:12-cv-123

---

ADAPTIX, INC.,

Plaintiff,

v.

T-MOBILE USA, INC.,

Defendant.

---

Civil Action 6:12-cv-369

---

ADAPTIX, INC.,

Plaintiff,

v.

AT&T MOBILITY LLC, ERICSSON INC.,  
METROPCS COMMUNICATIONS, INC.,  
and TELEFONAKTIEBOLAGET LM  
ERICSSON,

Defendants.

---

Civil Action 6:13-cv-049

---

ADAPTIX, INC.,

Plaintiff,

v.

AT&T MOBILITY LLC, ERICSSON INC.,  
METROPCS COMMUNICATIONS, INC.,  
and TELEFONAKTIEBOLAGET LM  
ERICSSON,

Defendants.

---

Civil Action 6:12-cv-050

**STIPULATION AND AGREED MOTION**  
**TO MODIFY EXPERT DISCOVERY DEADLINES**

Plaintiff, Adaptix, Inc., and Defendants, Alcatel-Lucent USA, Inc., AT&T Mobility LLC, Cellco Partnership d/b/a Verizon Wireless, Sprint Spectrum L.P., Ericsson Inc., MetroPCS Communications, Inc., and Telefonaktiebolaget LM Ericsson (collectively, “the parties”) hereby stipulate, subject to the approval of the Court, that:

1. The current deadlines for remaining expert discovery are as follows:

Pretrial Event	Deadline
Deadline to designate expert witnesses and reports on issues for which the party does not bear the burden of proof (§ 5)	August 28, 2014
Expert discovery deadline	September 12, 2014

2. The parties have agreed to a limited modification of these deadlines to accommodate the schedules of the expert witnesses and counsel.

3. Modification of these dates will not affect any other scheduled dates.

4. The parties now file this stipulated request to modify those deadlines as follows:

Pretrial Event	Deadline
Deadline to designate expert witnesses and reports on issues for which the party does not bear the burden of proof (§ 5)	September 3, 2014
Expert discovery deadline	September 17, 2014

Dated: August 8, 2014

By: /s/ Steven E. Lipman  
 Paul J. Hayes (admitted *pro hac vice*)  
[phayes@hayesmessina.com](mailto:phayes@hayesmessina.com)  
 Steven E. Lipman (admitted *pro hac vice*)  
[slipman@hayesmessina.com](mailto:slipman@hayesmessina.com)  
 HAYES MESSINA GILMAN & HAYES LLC  
 200 State Street, 6<sup>th</sup> Floor  
 Boston, MA 02109

Respectfully submitted,

By: /s/ Stephen Swedlow  
 Stephen Swedlow (*pro hac vice*)  
 Thomas Cushing (*pro hac vice*)  
 Brianne Straka (*pro hac vice*)  
 Marc Kaplan (*pro hac vice*)  
 Lauren Hillemann (*pro hac vice pending*)  
 QUINN EMANUEL URQUHART &  
 SULLIVAN LLP

Telephone: (617) 439-4200  
Facsimile: (617) 443-1999

Craig Tadlock  
Keith Smiley  
TADLOCK LAW FIRM PLLC  
2701 Dallas Parkway, Suite 360  
Plano, TX 75093  
Phone: (903) 730-6789

**Attorneys for ADAPTIX, INC.**

By: /s/ Geoffrey M. Godfrey  
Mark D. Flanagan  
Robert M. Galvin  
Geoffrey M. Godfrey  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
950 Page Mill Road  
Palo Alto, CA 94304  
Phone: (650) 858-6000  
Fax: (650) 858-6100

Michael E. Jones  
State Bar No. 10929400  
Allen F. Gardner  
State Bar No. 24043679  
POTTER MINTON, P.C.  
110 N. College, Suite 500  
Tyler, Texas 75702  
Tel: (903) 597-8311  
Fax: (903) 593-0846  
mikejones@potterminton.com  
allengardner@potterminton.com

**Attorneys for CELLCO PARTNERSHIP  
D/B/A VERIZON WIRELESS**

/s/ Douglas M. Kubehl  
Douglas M. Kubehl  
(Texas Bar No. 00796909)  
doug.kubehl@bakerbotts.com  
Jeffery S. Becker  
(Texas Bar No. 24069354)  
jeff.becker@bakerbotts.com  
BAKER BOTTS L.L.P.

500 West Madison  
Suite 2450  
Chicago, Illinois 60661  
Telephone: (312) 705-7400  
Fax: (312) 705-7499  
davenelson@quinnemanuel.com  
stephenswedlow@quinnemanuel.com  
thomascushing@quinnemanuel.com  
briannestraka@quinnemanuel.com  
marckaplan@quinnemanuel.com

Michael E. Jones  
POTTER MINTON PC  
110 North College, Suite 500  
Tyler, Texas 75710-0359  
Telephone: (903) 597-8311  
Fax: (903) 593-0846

**Attorneys for ALCATEL-LUCENT USA,  
INC., and AT&T MOBILITY, LLC**

By: /s/ Mark W. McGrory  
Mark W. McGrory (pro hac vice)  
Lawrence A. Rouse (pro hac vice)  
ROUSE HENDRICKS GERMAN  
MAY PC  
1201 Walnut, 20th Floor  
Kansas City, MO 64106  
Tel: (816) 471-7700  
Fax: (816) 471-2221  
MarkM@rhgm.com  
LarryR@rhgm.com

Michael E. Jones  
State Bar No. 10929400  
Allen F. Gardner  
State Bar No. 24043679  
POTTER MINTON, P.C.  
110 N. College, Suite 500  
Tyler, Texas 75702  
Tel: (903) 597-8311  
Fax: (903) 593-0846  
mikejones@potterminton.com  
allengardner@potterminton.com

**Attorneys for SPRINT SPECTRUM L.P.**

2001 Ross Avenue  
Dallas, Texas 75201  
Telephone: (214) 953-6500  
Facsimile: (214) 953-6503

**ATTORNEYS FOR AT&T MOBILITY  
LLC, ERICSSON INC.,  
TELEFONAKTIEBOLAGET LM  
ERICSSON AND METROPCS  
COMMUNICATIONS, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was filed electronically on August 8, 2014, in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service per Local Rule CV-5(b)(1).

/s/ Marc Kaplan

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
TYLER DIVISION**

---

ADAPTIX, INC.,

Plaintiff,

v.

ALCATEL-LUCENT USA, INC. and  
AT&T MOBILITY LLC,

Defendants.

Civil Action 6:12-cv-0022

---

ADAPTIX, INC.,

Plaintiff,

v.

ALCATEL-LUCENT USA, INC. and  
CELLCO PARTNERSHIP  
d/b/a VERIZON WIRELESS,

Defendants.

Civil Action 6:12-cv-0122

---

ADAPTIX, INC.,

Plaintiff,

v.

ALCATEL-LUCENT USA, INC. and  
SPRINT SPECTRUM L.P.,

Defendants.

---

Civil Action 6:12-cv-0123

---

ADAPTIX, INC.,

Plaintiff,

v.

T-MOBILE USA, INC.,

Defendant.

---

Civil Action 6:12-cv-369

---

ADAPTIX, INC.,

Plaintiff,

v.

AT&T MOBILITY LLC, ERICSSON INC.,  
METROPCS COMMUNICATIONS, INC.,  
and TELEFONAKTIEBOLAGET LM  
ERICSSON,

Defendants.

---

Civil Action 6:13-cv-049

---

ADAPTIX, INC.,

Plaintiff,

v.

AT&T MOBILITY LLC, ERICSSON INC.,  
METROPCS COMMUNICATIONS, INC.,  
and TELEFONAKTIEBOLAGET LM  
ERICSSON,

Defendants.

---

Civil Action 6:12-cv-050

**[PROPOSED] ORDER GRANTING STIPULATION AND AGREED MOTION  
TO MODIFY EXPERT DISCOVERY DEADLINES**

Before this Court is the parties' Stipulation and Agreed Motion To Modify Expert Discovery Deadlines. The Court having considered the Motion,

IT IS HEREBY ORDERED THAT the Court GRANTS the parties' Stipulation and Agreed Motion To Modify Expert Discovery Deadlines, and the expert discovery deadlines will be modified as agreed to and set forth below.

Pretrial Event	Deadline
Deadline to designate expert witnesses and reports on issues for which the party does not bear the burden of proof (§ 5)	September 3, 2014
Expert discovery deadline	September 17, 2014